

Designation Run Report

# Lawrence, Stephen Plaintiff and Defense Combined Submission

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Lawrence, Stephen 01-04-2019

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**Plaintiffs Affirmative Designations 00:47:30**

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**Defense Counter Designations 00:04:09**

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**Plaintiff Counter Counters 00:01:19**

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**Total Time 00:56:35**



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12:6 - 14:4

**Lawrence, Stephen 01-04-2019 (00:01:48)**

SL02.1

12:6 Q. Will you state your name for the

12:7 record, please.

12:8 A. Stephen Lawrence.

12:9 Q. Okay. Mr. Lawrence, when was the

12:10 first time you became employed with Cardinal

12:11 Health?

12:12 A. The first time I became employed

12:13 was around 1991, I believe. Somewhere in that

12:14 neighborhood.

12:15 Q. Okay. And what position did you

12:16 take in 1991?

12:17 A. Actually, I was running a company

12:18 they acquired. My brother and I had a pharmacy

12:19 software company that we started when we were in

12:20 college and they acquired it and I was running

12:21 that. It was called Ren-Lar Systems, Inc.

12:22 Q. Okay. I'm sorry. I didn't hear

12:23 the name of the company.

12:24 A. Ren-Lar Systems.

13:1 Q. Ren-Lar. And what did Ren-Lar

13:2 Systems, Inc. do?

13:3 A. It wrote pharmacy management

13:4 software for use in retail pharmacies.

13:5 Q. And what did the pharmacy

13:6 management software actually do?

13:7 A. It -- it's what every pharmacist

13:8 uses today to fill prescriptions. So behind the

13:9 counter, when you fill prescriptions, you

13:10 adjudicate them, it -- it's -- that's what the

13:11 pharmacy software does.

13:12 Q. Okay. And could you explain that

13:13 to me further? How does it aid a pharmacist in

13:14 filling prescriptions?

13:15 A. It's the software that has

13:16 their -- all their databases, their customers,

13:17 their drugs, the physicians, they fill

13:18 prescriptions. It bills the prescriptions to

13:19 third parties. It does all of the interactions

13:20 for drug-to-drug interactions and all that kind

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	13:21 of stuff.	
	13:22 The stuff that's required for them	
	13:23 to do in filling prescriptions. It does	
	13:24 inventory management. It does electronic	
	14:1 ordering to end distributors. It has a wide --	
	14:2 it has a reporting system. You know, there are	
	14:3 different systems out there, but that -- that	
	14:4 was pretty much what ours did.	
14:20 - 14:24	<b>Lawrence, Stephen 01-04-2019 (00:00:11)</b>	SL02.2
	14:20 And that company was acquired by	
	14:21 Cardinal Health in 1991; is that correct?	
	14:22 A. Yes.	
	14:23 Q. Okay.	
	14:24 A. Yes. They had acquired -- yeah.	
15:1 - 15:19	<b>Lawrence, Stephen 01-04-2019 (00:00:41)</b>	SL02.74
	15:1 They acquired part of the company. Let's put it	
	15:2 that way. So there was a -- Chapman Drug	
	15:3 Company was a wholesaler in Knoxville,	
	15:4 Tennessee. It had a few distribution centers.	
	15:5 They owned half our company. My brother and I	
	15:6 owned the other half. They acquired Chapman	
	15:7 Drug Company in 1991. So they actually got	
	15:8 50 percent of the company when they acquired	
	15:9 Chapman Drug Company.	
	15:10 Q. And what position in 1991 did you	
	15:11 take at Cardinal Health?	
	15:12 A. I was still the -- I forget my	
	15:13 title there. I was still at Ren-Lar, running --	
	15:14 basically running Ren-Lar Systems.	
	15:15 Q. Okay.	
	15:16 A. I ran all of the installation,	
	15:17 training, maintenance, sales, that kind of	
	15:18 stuff. My brother did all of the software	
	15:19 development.	
16:2 - 18:22	<b>Lawrence, Stephen 01-04-2019 (00:03:17)</b>	SL02.3
	16:2 Q. Okay. How long were you in that	
	16:3 position at Cardinal Health?	
	16:4 A. I was in that position until	
	16:5 around 1995, where they bought the rest of our	
	16:6 company. And I moved to Columbus, Ohio in '96	

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16:7 to head up a startup that we were doing at

16:8 Cardinal called ScriptLine.

16:9 Q. And what did ScriptLine do?

16:10 A. ScriptLine was what we called pre-

16:11 and post-adjudication of claims -- of

16:12 third-party claims. So at that time, in 1996,

16:13 managed care was becoming real prevalent, so

16:14 most of the prescriptions were adjudicated

16:15 electronically. ScriptLine would look at

16:16 customers of ScriptLine.

16:17 The claim would go to ScriptLine

16:18 for edits to make sure that they billed it

16:19 properly. A big issue was, if you're filling

16:20 for a brand name drug and there was a generic

16:21 available, the doctor needed to say, "dispense

16:22 as written," so that was what we call DAW code

16:23 of 1. If you didn't put that in there, they

16:24 would pay you for the generic and so you would

17:1 lose a bunch of money.

17:2 So we would catch these kind of

17:3 billing errors, send it back to the pharmacy and

17:4 let them correct it before they billed them.

17:5 Q. How long were you in that position

17:6 with ScriptLine?

17:7 A. About three years or so. And then

17:8 we started a company called Arclight Systems and

17:9 ScriptLine spun off, and -- outside of Cardinal,

17:10 although Cardinal became part of it, became

17:11 Arclight Systems.

17:12 Q. And what does or did Arclight

17:13 System do?

17:14 A. Arclight System was a group of

17:15 retailers that got together to put their data

17:16 together to basically answer questions from

17:17 manufacturers that they had around prescription

17:18 data.

17:19 Q. So Cardinal Health -- Cardinal

17:20 Health is a distributor of drugs, correct?

17:21 A. As -- yes, many other things, but

17:22 that's one of their -- one of the pieces

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17:23 Cardinal Health does.

17:24 Q. And then you indicated there were

18:1 retailers involved with Arclight, as well?

18:2 A. The vast majority of Arclight were

18:3 retailers, yes.

18:4 Q. And do you know the retailers?

18:5 A. I could name some of them, but --

18:6 Q. Okay.

18:7 A. -- CVS was the largest. We had

18:8 Walmart. We had Albertsons, K-mart. And then

18:9 quite a few smaller chains, like Lewis Drug,

18:10 Kenny Drug. Some others.

18:11 Q. And what information would these

18:12 retailers share with Arclight?

18:13 A. They shared their prescription

18:14 data. And it was encrypted for patient -- so

18:15 the patient information was encrypted, but you

18:16 would see the drug and the dosage and the doctor

18:17 and that kind of stuff. The typical stuff that

18:18 they would produce today to what I used to call

18:19 IMS. I think it's called IQVIA now. But IMS

18:20 has been out there forever. It was in existence

18:21 when Arclight started, and it was the same data

18:22 they provided to IMS back in that day.

21:9 - 24:14

**Lawrence, Stephen 01-04-2019 (00:03:31)**

SL02.4

21:9 Q. And did you stay with Cardinal

21:10 Health after that '02 or '03 time frame and --

21:11 A. No. I actually had a year where I

21:12 basically did some consulting and I helped wind

21:13 down Arclight. We had a lot of things to get

21:14 done with it. So I did that. Did some

21:15 consulting work for about a year and a half, and

21:16 then I came -- Cardinal asked me to come back

21:17 and take a role in marketing -- retail

21:18 marketing.

21:19 Q. Okay. And what year would that

21:20 have been?

21:21 A. That would have been -- and I'm

21:22 guessing. I don't have my resume in front of

21:23 me, but it was 2004, I think.

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21:24 Q. Okay. And what position would you  
22:1 have taken at Cardinal Health in 2004?  
22:2 A. Vice president of retail  
22:3 marketing.  
22:4 Q. And what were your job  
22:5 responsibilities as vice president of retail  
22:6 marketing at Cardinal Health?  
22:7 A. So it was to run the retail  
22:8 marketing group.  
22:9 Q. And what did the retail marketing  
22:10 group do?  
22:11 A. So the retail marketing group  
22:12 basically built services to help retail  
22:13 independent pharmacies run their business  
22:14 better. So we had services like managed care,  
22:15 claims reconciliation. We managed their entire  
22:16 front of store, so all of their OTCs, those kind  
22:17 of things.  
22:18 Q. How long were you in that  
22:19 position?  
22:20 A. I was in that position in various  
22:21 pieces, because we basically ended up combining  
22:22 retail marketing with all the other marketing --  
22:23 all the other class of trade, and I took over  
22:24 all of marketing, but I was in that marketing  
23:1 role for -- until about 2009, I believe, when I  
23:2 took the sales role. I'm -- those are general  
23:3 dates, so I'd have to look at my resume to get  
23:4 exact dates, but that's roughly about the time.  
23:5 Q. Okay. And in 2009, what position  
23:6 did you take at Cardinal Health?  
23:7 A. I was the senior vice president of  
23:8 independent sales.  
23:9 Q. What does "independent sales" mean  
23:10 at Cardinal Health?  
23:11 A. It's the team that sells to retail  
23:12 independents.  
23:13 Q. And when you say "retail  
23:14 independents," is that retail independent  
23:15 pharmacies?

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23:16 A. Yes, I'm sorry. Retail  
 23:17 independent pharmacies.  
 23:18 Q. How does Cardinal Health define a  
 23:19 retail independent pharmacy?  
 23:20 A. It's typically -- it's not a  
 23:21 publicly traded company, obviously. Those would  
 23:22 be chains. It's typically a single site owner  
 23:23 or multisite owner that's under roughly 25  
 23:24 stores or so. So we do have some retail  
 24:1 independent owners that are up in the 18, 19  
 24:2 stores. We have some that are over that, but  
 24:3 that's a rough generality of -- somewhere in  
 24:4 that 25 range.

24:5 When they actually become a  
 24:6 corporation and have, like, central offices and  
 24:7 stuff, that goes over to our chain world.  
 24:8 Q. Okay. When you were -- going back  
 24:9 to 2000 for the period up to 2009 when you were  
 24:10 the vice president of retail marketing, who was  
 24:11 your direct report? Who did you directly report  
 24:12 to?

24:13 A. I directly reported to -- when I  
 24:14 started, a person named Michael Bender.

25:7 - 25:21

**Lawrence, Stephen 01-04-2019 (00:01:01)**

SL02.5

25:7 Q. Okay. And as your role in -- as  
 25:8 vice president of retail marketing, how many  
 25:9 employees were in your division at that time?  
 25:10 A. It would be a guess, so I would  
 25:11 say it was probably 50, maybe. And we did buy a  
 25:12 company that we had about another 75 part-time  
 25:13 people who made phone calls to pharmacies to  
 25:14 help them with billing problems. So it went  
 25:15 from 50 to 50-plus, about 75 part-time.  
 25:16 Q. Okay. And then -- and when you  
 25:17 took over the sales role as senior vice  
 25:18 president independent retail pharmacy sales, how  
 25:19 many employees were in the retail independent  
 25:20 pharmacy sales side?

25:21 A. About 300 total.

25:22 - 26:10

**Lawrence, Stephen 01-04-2019 (00:00:28)**

SL02.96

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25:22 Q. And did that stay consistent from  
25:23 2009 forward?

25:24 A. For the retail sales team, it has  
26:1 stayed fairly consistent, yeah. It grew by  
26:2 about 25 when we bought Kinray in New York.  
26:3 So -- right now, but through changes and stuff,  
26:4 it's right at that -- it's just under 300 today.

26:5 Q. Are you still employed by Cardinal  
26:6 today?

26:7 A. Yes.

26:8 Q. And what position are you in?

26:9 A. Senior vice president of  
26:10 independent sales.

26:24 - 27:4

**Lawrence, Stephen 01-04-2019 (00:00:17)**

SL02.81

26:24 Q. And the employees that you had  
27:1 during this period of time, 2004 to the present,  
27:2 would they have also -- do you believe they  
27:3 understood that part of their role was to sell  
27:4 opioids to independent retail pharmacies?

27:6 - 27:15

**Lawrence, Stephen 01-04-2019 (00:00:24)**

SL02.90

27:6 A. Yeah. Our sales team doesn't sell  
27:7 individual drugs and opioids to pharmacies.  
27:8 What our sales team does is sells our  
27:9 distribution services and marketing services to  
27:10 pharmacies. The customers order whatever  
27:11 products they want from our distribution  
27:12 business, so we don't actually go out and sell  
27:13 any one particular item to a customer.

27:14 Q. Well, you market certain items to  
27:15 customers, don't you?

27:17 - 28:4

**Lawrence, Stephen 01-04-2019 (00:00:27)**

SL02.91

27:17 A. I -- I don't market anything. In  
27:18 my marketing role, we did not market items to  
27:19 customers.

27:20 Q. You didn't market opioids to  
27:21 customers ever?

27:22 A. I have never.

27:23 Q. Well, has your -- has your team?

27:24 A. Not that I'm aware of.

28:1 Q. Okay. And with respect to selling



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28:6 - 28:10	<p>28:2 opioids, what you're indicating is that if a</p> <p>28:3 pharmacy buys opioids from Cardinal Health, you</p> <p>28:4 distribute that to the pharmacy?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:13)</b></p> <p>28:6 A. Yeah, I'm not -- I'm not</p> <p>28:7 indicating that at all. If a customer orders</p> <p>28:8 anything from Cardinal and it passes all of the</p> <p>28:9 things that we do when we check orders, then we</p> <p>28:10 distribute it to a pharmacy.</p>	SL02.92
31:19 - 31:24	<p><b>Lawrence, Stephen 01-04-2019 (00:00:17)</b></p> <p>31:19 Q. And in 2009, when you were senior</p> <p>31:20 vice president of independent -- or retail</p> <p>31:21 independent pharmacy sales, did you ever have</p> <p>31:22 any discussions with sales teams about what a</p> <p>31:23 suspicious order was and how it was defined at</p> <p>31:24 Cardinal Health?</p>	SL02.97
32:2 - 32:15	<p><b>Lawrence, Stephen 01-04-2019 (00:00:34)</b></p> <p>32:2 A. Our only discussion with the sales</p> <p>32:3 teams was through our training that we had</p> <p>32:4 around our suspicious order monitoring system;</p> <p>32:5 that there was a system out there. But it</p> <p>32:6 wasn't our job to determine when an order is or</p> <p>32:7 isn't held or suspicious. It was all done by a</p> <p>32:8 QRA in our system.</p> <p>32:9 Q. Do you know what the system was in</p> <p>32:10 2004 at Cardinal Health to detect suspicious</p> <p>32:11 orders?</p> <p>32:12 A. I'm not sure what the -- how --</p> <p>32:13 what you're asking there, about "what the system</p> <p>32:14 was." Can you be more specific?</p> <p>32:15 Q. Well, you indicated that --</p>	SL02.98
32:18 - 33:11	<p><b>Lawrence, Stephen 01-04-2019 (00:00:44)</b></p> <p>32:18 A. If you could be more specific. I</p> <p>32:19 don't know -- "system" is a broad term, so...</p> <p>32:20 Q. Well, you indicated that you knew</p> <p>32:21 of a system to detect suspicious orders; is that</p> <p>32:22 correct?</p> <p>32:23 A. Yeah. The way I would define a</p> <p>32:24 system is that as the order came from a</p> <p>33:1 customer, there is a system, whether it be</p>	SL02.99

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33:2 electronic, or people, or a combination of both,  
 33:3 that looked at those orders and would either  
 33:4 approve them for sale or not. And that system  
 33:5 did a lot more than just controlled substances.  
 33:6 We also have allocation systems. We also have  
 33:7 credit systems that look at orders.  
 33:8 So the orders go through a lot of  
 33:9 checks before they're released. And that --  
 33:10 that -- that's what I would call the system  
 33:11 as -- if that's what you're asking.

35:13 - 35:20

**Lawrence, Stephen 01-04-2019 (00:00:18)**

SL02.100

35:13 Q. Well, sales operations trained the  
 35:14 sales team, correct?  
 35:15 A. Sales operations had the training  
 35:16 piece that did train the independent sales team,  
 35:17 yes.  
 35:18 Q. Okay. And did they ever train the  
 35:19 sales team concerning what a suspicious order  
 35:20 was?

35:23 - 36:21

**Lawrence, Stephen 01-04-2019 (00:00:58)**

SL02.101

35:23 A. I'd have to go back and look. The  
 35:24 training that they provided was provided by --  
 36:1 so when they do training, they get training from  
 36:2 all different departments inside of Cardinal to  
 36:3 train the retail independent sales team. So any  
 36:4 training on this would have been provided by our  
 36:5 QRA, and they would have just provided that  
 36:6 training to the team.  
 36:7 So to say, did they train them on  
 36:8 what a suspicious order was, we trained them on  
 36:9 the suspicious order monitoring system, but not  
 36:10 the details of how it worked or what an order  
 36:11 looked like. Our sales team doesn't see the  
 36:12 orders every day. Customers order those  
 36:13 electronically.  
 36:14 Our sales team's focus really is  
 36:15 to sell the marketing programs and keep the  
 36:16 relationship with the customer. It's not -- we  
 36:17 don't monitor the sales every day or look at  
 36:18 items or anything like that.

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36:23 - 37:10	<p>36:19 Q. Well, would you agree with me that</p> <p>36:20 the sales team is the front line of the defense</p> <p>36:21 with respect to diversion of opioids?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:22)</b></p> <p>36:23 A. I would disagree with that.</p> <p>36:24 Q. Okay.</p> <p>37:1 A. I don't think they can be the</p> <p>37:2 front line of defense. We're hiring people</p> <p>37:3 right out of college to be a salesperson. To</p> <p>37:4 say they're the front line of defense against</p> <p>37:5 something, anything, would be hard to ask them</p> <p>37:6 to be.</p> <p>37:7 Q. Sure.</p> <p>37:8 It would take more experienced</p> <p>37:9 people than somebody right out of college?</p> <p>37:10 A. No, I mean --</p>	SL02.102
37:14 - 38:7	<p><b>Lawrence, Stephen 01-04-2019 (00:00:45)</b></p> <p>37:14 A. I think you're just -- when you're</p> <p>37:15 saying you're the front line of defense, that's</p> <p>37:16 a broad statement.</p> <p>37:17 Q. Have you ever heard the term that</p> <p>37:18 the sales force is the boots on the ground when</p> <p>37:19 it comes to preventing diversion at Cardinal</p> <p>37:20 Health?</p> <p>37:21 A. I've never heard them called that.</p> <p>37:22 It -- it may have happened. I don't know. But</p> <p>37:23 I don't -- I would never refer to them in that</p> <p>37:24 manner. They're part of a team that deals with</p> <p>38:1 our customers in all aspects.</p> <p>38:2 Q. Does the sales force -- in --</p> <p>38:3 in -- in your understanding as the senior vice</p> <p>38:4 president of independent sales team for retail</p> <p>38:5 independent pharmacies, does the -- does the</p> <p>38:6 sales force have a responsibility to prevent</p> <p>38:7 diversion of opioids?</p>	SL02.103
38:9 - 38:19	<p><b>Lawrence, Stephen 01-04-2019 (00:00:29)</b></p> <p>38:9 A. The sales team has responsibility</p> <p>38:10 to -- for a lot of things. Making sure the</p> <p>38:11 customers are valid customers; making sure</p> <p>38:12 they're doing things as much as they can know</p>	SL02.10

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38:13 that they're doing things properly. They also  
 38:14 have the same issues around credit and things.  
 38:15 So they have a duty to do all of those kind of  
 38:16 things for Cardinal Health and for our  
 38:17 customers.

38:18 Q. So they have a duty to prevent  
 38:19 diversion of opioids; is that correct?

38:22 - 39:11

**Lawrence, Stephen 01-04-2019 (00:00:38)**

SL02.11

38:22 A. Yeah, I didn't say they had a duty  
 38:23 to divert -- to -- I don't want to misspeak what  
 38:24 you said, but I don't think that's their duty,  
 39:1 to stop diversion of opioids. Their duty is to  
 39:2 build a relationship with the customer and sell  
 39:3 them our distribution services and sell them our  
 39:4 marketing programs. That's their real duty.  
 39:5 Q. They have to know the customer; is  
 39:6 that correct?

39:7 A. They do have to know the customer,  
 39:8 as much as they can.

39:9 Q. They go out and see the customer,  
 39:10 the pharmacy, see what's going on in the  
 39:11 pharmacy?

39:13 - 39:21

**Lawrence, Stephen 01-04-2019 (00:00:19)**

SL02.12

39:13 A. They do go physically out to  
 39:14 pharmacies, absolutely.  
 39:15 Q. Should they -- do they know how  
 39:16 much -- how many opioids are being sold to that  
 39:17 pharmacy?

39:18 A. They -- I don't know the answer.  
 39:19 I mean, some might, if they look, but they  
 39:20 don't -- it's not a general report that we  
 39:21 produce to anybody.

73:1 - 73:7

**Lawrence, Stephen 01-04-2019 (00:00:07)**

SL02.13

73:1 - - -

73:2 BY MS. QUEZON:

73:3 Q. Let me go ahead and hand you  
 73:4 what's been marked as Exhibit 5. And I  
 73:5 apologize, some of these fall apart because it's  
 73:6 thick and the staples aren't holding.

73:7 A. Okay.

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73:11 - 73:17	<b>Lawrence, Stephen 01-04-2019 (00:00:13)</b> 73:11 BY MS. QUEZON: 73:12 Q. And you can look through it as 73:13 much as you want, but it is your personnel file. 73:14 And there's just a few items that I kind of 73:15 wanted to address with you. But at any time if 73:16 you need to look through it more thoroughly, 73:17 please take that -- that opportunity.	SL02.14
81:2 - 81:12	<b>Lawrence, Stephen 01-04-2019 (00:00:37)</b> 81:2 All right. Okay. If you will 81:3 turn to the second page of the review, which is 81:4 .58, and in the third section on that page, 81:5 "Expand our analytics capabilities." 81:6 Do you see that? 81:7 A. Yes. 81:8 Q. Okay. And it looks like, just to 81:9 make sure I'm reading this properly, under the 81:10 "Results" column in this evaluation, is that you 81:11 writing or is that the -- your man- -- or is 81:12 that Mr. Bender writing?	SL02.15
81:15 - 82:4	<b>Lawrence, Stephen 01-04-2019 (00:00:29)</b> 81:15 A. Under the "Results" column -- 81:16 Q. Yes, sir. 81:17 A. -- would be me. 81:18 Q. And then, obviously, "Manager's 81:19 Comments" would be Mr. Bender's? 81:20 A. Correct. 81:21 Q. All right. Sorry. We can go back 81:22 to that second page again, .58. 81:23 So under the "Results" column for 81:24 the "Expand our Analytics Capability" objective, 82:1 it says, "Todd was able to recruit a very 82:2 talented person to add to his staff." 82:3 Is that Mr. Cameron that you're 82:4 referring to?	SL02.16
82:12 - 82:14	<b>Lawrence, Stephen 01-04-2019 (00:00:04)</b> 82:12 A. I would think so. I couldn't be 82:13 100 percent certain, but I'm -- I would think 82:14 so.	SL02.17
82:20 - 83:14	<b>Lawrence, Stephen 01-04-2019 (00:00:53)</b>	SL02.18

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82:20 Q. Okay. And it goes on to say, "We  
 82:21 are now able to create in-depth monthly analysis  
 82:22 on our marketing effectiveness in all areas.  
 82:23 These analyses have helped us guide our field  
 82:24 sales teams to focus on churn rate and higher  
 83:1 generic utilization by our customers. Both of  
 83:2 these areas have improved dramatically during  
 83:3 fiscal year '06."  
 83:4 And then under the manager's  
 83:5 report, it -- it states, "A critical link in  
 83:6 improving our marketing efforts is the ability  
 83:7 to segment our customer understanding. Steve's  
 83:8 focus on building out our analytics capability  
 83:9 has driven a much deeper understanding of our  
 83:10 customer base and has allowed us to be more  
 83:11 focused."  
 83:12 Can you tell me just a little bit  
 83:13 about what you did in regard to the analytics  
 83:14 when you came back that first fiscal year?

83:16 - 84:16

**Lawrence, Stephen 01-04-2019 (00:00:59)**

SL02.19

83:16 A. So it might be a -- a longer -- a  
 83:17 little bit longer answer but --  
 83:18 Q. That's all right.  
 83:19 A. -- we didn't have any sales force  
 83:20 automation tools or any analytics around the  
 83:21 sales force at this point in time. And so what  
 83:22 we tried to establish was, each one of our  
 83:23 marketing programs, and we talked about, like  
 83:24 our managed care, our reconciliation, front of  
 84:1 store, what effectiveness did that have on  
 84:2 driving -- did people stay longer with us if  
 84:3 they were on two or three programs, which  
 84:4 hopefully they would because we would help them  
 84:5 run their business better.  
 84:6 But we started to build that  
 84:7 analytics capability around our annual show,  
 84:8 which we call the Retail Business Conference,  
 84:9 and each marketing program, what effect it had  
 84:10 on customer retention, which is what you would  
 84:11 do in any marketing role when you're selling

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84:12 services like that.

84:13 So that -- we started to create

84:14 that, and that's really what, I think, he's

84:15 referring to and I'm referring to in that

84:16 document.

90:16 - 90:18

**Lawrence, Stephen 01-04-2019 (00:00:13)**

SL02.80

90:16 Q. Okay. So through ScriptLine,

90:17 Cardinal would have all of the dispensing

90:18 information for all of its customers?

90:20 - 92:7

**Lawrence, Stephen 01-04-2019 (00:01:22)**

SL02.84

90:20 A. Absolutely not.

90:21 Q. Tell me how -- why not.

90:22 A. So the -- the founders only

90:23 allowed us to sell reports, not data -- not

90:24 prescription level data. Everything's

91:1 de-identified, even to the ZIP code level. So

91:2 you're only selling reports that answered

91:3 questions for manufacturers. So the only

91:4 customers of Arclight were manufacturers,

91:5 period. No member, owner, partner in Arclight

91:6 could get data from the Arclight full dataset.

91:7 You had competitors in there. You couldn't

91:8 share data between CVS and K-mart for, say.

91:9 Cardinal the same way.

91:10 So we could never sell data to any

91:11 distributors, any other retailers. The only

91:12 customers we could sell to were manufacturers.

91:13 And every time we sold any reports had to be

91:14 approved by the board, which was a member of our

91:15 largest members, which would be CVS and K-mart

91:16 and those people.

91:17 Q. Right now I'm talking about

91:18 ScriptLine.

91:19 A. Oh, ScriptLine?

91:20 Q. Yes.

91:21 A. You said Arclight. I'm sorry.

91:22 Q. I apologize if I did. I did not

91:23 mean to.

91:24 A. Yeah.

92:1 Q. I'm talking about ScriptLine. At

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Page/Line	Source	ID
	92:2 the time -- if Cardinal was providing this	
	92:3 service to its customers --	
	92:4 A. Correct.	
	92:5 Q. -- then Cardinal would have the	
	92:6 dispensing data for the customers that were part	
	92:7 of ScriptLine?	
92:9 - 92:9	<b>Lawrence, Stephen 01-04-2019 (00:00:00)</b>	SL02.85
	92:9 A. Yeah. So at that time, we had	
92:10 - 93:6	<b>Lawrence, Stephen 01-04-2019 (00:01:07)</b>	SL02.95
	92:10 some customers on ScriptLine, not a tremendous	
	92:11 amount, but some customers were on ScriptLine.	
	92:12 The data -- the only data that we had was	
	92:13 totally de-identified and was only -- there was	
	92:14 a lot of HIPAA issues. So it was only available	
	92:15 to the ScriptLine team, and it was in aggregate.	
	92:16 So Cardinal itself, outside of the	
	92:17 ScriptLine team, had no access to this data. We	
	92:18 built firewalls around it. Most of it was	
	92:19 housed in Paradise Valley, out in Las Vegas	
	92:20 area, for that purpose, that it was cordoned off	
	92:21 so that we didn't have any transfer of data	
	92:22 between other parts of Cardinal and the	
	92:23 ScriptLine data.	
	92:24 When we started Arclight, we'd	
	93:1 have to go back and get the data how many	
	93:2 customers we had. It was probably maybe eight,	
	93:3 nine hundred of our -- right now we do business	
	93:4 with, like, 7,000 independents. At the time, I	
	93:5 think we probably had eight, nine hundred, maybe	
	93:6 a thousand customers on it.	
106:8 - 106:10	<b>Lawrence, Stephen 01-04-2019 (00:00:19)</b>	SL02.20
	106:8 Q. If we can go back to	
	106:9 your personnel file, Mr. Lawrence. And if we	
	106:10 can go to Page 3.	
106:11 - 107:2	<b>Lawrence, Stephen 01-04-2019 (00:00:45)</b>	SL02.21
	106:11 A. Okay.	
	106:12 Q. It appears that this is the fiscal	
	106:13 year that includes, I guess, 2009 and 2010.	
	106:14 Do you see at the top, the date,	
	106:15 June 30th?	



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106:16 A. Yes.

106:17 Q. Okay. I just want to ask you a

106:18 couple questions about one of these programs.

106:19 If you -- if you go to the bottom portion under

106:20 the "Employee Comments on Performance Goals," in

106:21 the second full paragraph, it states, "We were

106:22 also able to roll out WinWatcher as our sales

106:23 tool to all sales team members and have made it

106:24 our sales force automation tool."

107:1 Can you explain to the jury what

107:2 WinWatcher is and how it works --

107:4 - 107:4 **Lawrence, Stephen 01-04-2019 (00:00:01)**

SL02.22

107:4 Q. -- where it worked?

107:6 - 108:6 **Lawrence, Stephen 01-04-2019 (00:01:12)**

SL02.23

107:6 A. It's a sales force automation

107:7 tool.

107:8 Q. So what -- if I'm -- if I'm a

107:9 salesperson, what information could I get from

107:10 it and how quickly?

107:11 A. So it has all of your customers in

107:12 it. It has their summed up purchases, like, you

107:13 know, dollars. It has what marketing programs

107:14 they're on, and it has the things we talked

107:15 about before with the red, green, yellow lights

107:16 on credit, some threshold events. Any group

107:17 that needed to get the information to the sales

107:18 force would be in that tool where they could get

107:19 access to it.

107:20 So it's like any other sales force

107:21 automation tool. It was updated at this point

107:22 in time when we started. I believe it was

107:23 updated weekly from a sales dollar perspective.

107:24 Q. Okay. And it mentions that it

108:1 was -- "we were able to roll out WinWatcher."

108:2 So was this something new that

108:3 occurred during this fiscal year?

108:4 A. Correct, yes.

108:5 Q. Prior to -- and was that something

108:6 that -- that you sort of spearheaded?

108:8 - 109:19 **Lawrence, Stephen 01-04-2019 (00:01:46)**

SL02.24

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108:8 A. Yeah. So to go back in time a  
 108:9 little bit, this was -- we had, just a couple  
 108:10 years prior to this, created a national retail  
 108:11 independent sales team. Before that, the  
 108:12 independent sales team reported to each  
 108:13 division -- each distribution center.  
 108:14 So it was very disparate across  
 108:15 the country. And so given that it was, it  
 108:16 didn't have any sales tools, it didn't have any  
 108:17 common compensation programs, it didn't have a  
 108:18 lot of stuff. So in around 2007, we created a  
 108:19 national sales team. And this was -- when I  
 108:20 took over, one of the things we had been working  
 108:21 on since we started that was this sales force  
 108:22 automation tool.

108:23 And so I had a group of three  
 108:24 developers that developed it, and we rolled it  
 109:1 out across the country, which is a -- a key  
 109:2 thing you need in a sales team like that.

109:3 Q. So it sounds like, Mr. Lawrence,  
 109:4 that your -- your background -- and I apologize,  
 109:5 I didn't even ask you what you -- what your  
 109:6 degree is in.

109:7 But do you have a background in  
 109:8 analytics, or was that more your brother and you  
 109:9 were the sales side of it, or --

109:10 A. My background was more engineering  
 109:11 and analytics and IT. I mean, we -- when you  
 109:12 have a software company, you all learn IT pretty  
 109:13 well. So that was my background. Not really  
 109:14 from the sales side as much as the other side.

109:15 Q. And throughout, let's say, 2005,  
 109:16 when you -- when you came back to Cardinal kind  
 109:17 of full-time up through 2012, did anybody ever  
 109:18 ask you to help with a system that would  
 109:19 identify suspicious orders?

109:21 - 110:4

**Lawrence, Stephen 01-04-2019 (00:00:19)**

SL02.25

109:21 A. I don't -- I don't recall anybody  
 109:22 asking me personally to help with a system to  
 109:23 identify suspicious orders. It -- it was

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110:8 - 110:20	<p>109:24 totally in the QRA realm and outside of the</p> <p>110:1 marketing and the sales roles that I had.</p> <p>110:2 Q. And so the analytics that you were</p> <p>110:3 doing, obviously, was more in tune with your</p> <p>110:4 role in marketing and sales?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:21)</b></p> <p>110:8 A. Absolutely. I mean, we -- like I</p> <p>110:9 said before, we want to do analytics around the</p> <p>110:10 marketing programs to see if they're effective.</p> <p>110:11 Q. Sure.</p> <p>110:12 A. If they're not effective, you want</p> <p>110:13 to --</p> <p>110:14 Q. Change.</p> <p>110:15 A. -- stop them. So it was more of</p> <p>110:16 those analytics around that. And then obviously</p> <p>110:17 as we moved into sales, you know, customer</p> <p>110:18 retention and any kind of sales analytics that</p> <p>110:19 you would do from a customer base would --</p> <p>110:20 that's what we did.</p>	SL02.26
116:19 - 116:24	<p><b>Lawrence, Stephen 01-04-2019 (00:00:11)</b></p> <p>116:19 Q. Okay. All right. Now let's look</p> <p>116:20 at a new document, and it's going to be 3708.</p> <p>116:21 - - -</p> <p>116:22 (Cardinal-Lawrence Exhibit 8 marked.)</p> <p>116:23 - - -</p> <p>116:24</p>	SL02.28
117:1 - 117:7	<p><b>Lawrence, Stephen 01-04-2019 (00:00:17)</b></p> <p>117:1 BY MS. QUEZON:</p> <p>117:2 Q. Now, you're probably going to be</p> <p>117:3 very familiar with this, Mr. Lawrence, so I</p> <p>117:4 apologize if I'm being elementary, but these go</p> <p>117:5 from the back forward. So the earliest e-mail</p> <p>117:6 will be on Page 3 of the document and then the</p> <p>117:7 more recent will be...</p>	SL02.27
117:9 - 117:10	<p><b>Lawrence, Stephen 01-04-2019 (00:00:09)</b></p> <p>117:9 A. Okay.</p>	SL02.29
117:11 - 117:15	<p><b>Lawrence, Stephen 01-04-2019 (00:00:23)</b></p> <p>117:11 Page 3 -- and just to kind of sum up, it looks</p> <p>117:12 like there was a pharmacist who was having some</p>	SL02.104

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117:13	of his hydrocodone cut, his order cut.	
117:14	Do you see that in the initial	
117:15	e-mail, sent on October 17th --	
117:17 - 117:17	<b>Lawrence, Stephen 01-04-2019 (00:00:00)</b>	SL02.30
117:17	Q. -- 2007?	
117:19 - 118:7	<b>Lawrence, Stephen 01-04-2019 (00:00:31)</b>	SL02.31
117:19	A. Yes.	
117:20	Q. All right. And then just above	
117:21	that, the -- the next e-mail in response to	
117:22	this, basically on the second full sentence,	
117:23	"We've explained at 50,000 foot view to	
117:24	customer, and your team has been out to do site	
118:1	visits in most all of the top 25 that was	
118:2	identified on the DEA list."	
118:3	Do you see that?	
118:4	A. Yes.	
118:5	Q. So apparently this particular	
118:6	pharmacy got identified by the DEA and their	
118:7	orders had been cut?	
118:10 - 118:11	<b>Lawrence, Stephen 01-04-2019 (00:00:02)</b>	SL02.32
118:10	Q. At least according to the e-mail,	
118:11	correct?	
118:14 - 119:8	<b>Lawrence, Stephen 01-04-2019 (00:00:57)</b>	SL02.33
118:14	A. I guess so. I'm not -- it does	
118:15	say in that bottom part that we had cut his	
118:16	orders.	
118:17	Q. All right. Let's go to the next	
118:18	page, Page 2, and the e-mail from Michael	
118:19	Ambrose to Mr. Bender.	
118:20	Now, at this point, Mr. Bender	
118:21	would have been your direct supervisor, correct?	
118:22	This is 2007.	
118:23	A. Correct.	
118:24	Q. All right. So this is from	
119:1	Mr. Ambrose to your supervisor, and begins,	
119:2	"Gents, Good afternoon and FYI." It goes on to	
119:3	say, "We have 24 customers we're going to also	
119:4	shut off or limit purchases due to the recent	
119:5	activity in Houston with the DEA."	
119:6	And then it goes on to list some	

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119:10 - 119:10	119:7 customers, total 24, and sums up by saying, 119:8 that's \$50 million annually. Correct? <b>Lawrence, Stephen 01-04-2019 (00:00:01)</b>	SL02.34
119:11 - 120:15	119:10 A. Correct. <b>Lawrence, Stephen 01-04-2019 (00:01:02)</b> 119:11 Q. All right. Ultimately, this 119:12 e-mail thread gets forwarded to you? And -- if 119:13 you look on the first page of the document. 119:14 A. Correct. 119:15 Q. And on that same day, I think, 119:16 10/19 -- no, two days later. 119:17 10/19/2007, you e-mail Steve 119:18 Reardon. 119:19 And at that point, is -- is 119:20 Mr. Reardon in QRA? 119:21 A. I believe he was, yes. 119:22 Q. All right. And you say, "My 119:23 marketing analytics group could help here. If 119:24 we knew the triggers, we could develop a report 120:1 which would only show those stores that hit the 120:2 triggers. The data is in SDW." 120:3 What is SDW? 120:4 A. Sales data warehouse. 120:5 Q. And what is sales data warehouse? 120:6 A. It's a data warehouse for all of 120:7 our sales data. 120:8 Q. Is it, like, literally a 120:9 warehouse? 120:10 A. It's a data warehouse. 120:11 Q. Okay. So it's electronically 120:12 stored? 120:13 A. Correct. 120:14 Q. Okay. So you have the information 120:15 already available? <b>Lawrence, Stephen 01-04-2019 (00:00:15)</b>	SL02.105
120:17 - 121:1	120:17 A. It's in sales -- what information 120:18 are you asking about? 120:19 Q. Well -- 120:20 A. We didn't have the triggers 120:21 available. The sales data was in the sales data	SL02.35

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	120:22 warehouse, but we didn't know the triggers, so	
	120:23 you couldn't really do anything with it.	
	120:24 Q. Sure.	
	121:1 But you had all the sales data?	
121:3 - 121:3	<b>Lawrence, Stephen 01-04-2019 (00:00:00)</b>	SL02.36
	121:3 A. Absolutely.	
121:5 - 122:3	<b>Lawrence, Stephen 01-04-2019 (00:00:41)</b>	SL02.37
	121:5 Q. Okay. And "We can get history by	
	121:6 location, by item going back 33 months."	
	121:7 So almost three years you can go	
	121:8 back and look at sales history?	
	121:9 A. Correct.	
	121:10 Q. "We could build a table to the	
	121:11 CINs..."	
	121:12 What does that stand for,	
	121:13 Mr. Lawrence?	
	121:14 A. Cardinal item number.	
	121:15 Q. Okay. And -- and those are	
	121:16 specific to --	
	121:17 A. A drug NDC, for prescription	
	121:18 drugs. You'd also have a Cardinal item number	
	121:19 for an OTC product. But it's an individual,	
	121:20 unique product.	
	121:21 Q. Gotcha.	
	121:22 So, for instance, in this case, if	
	121:23 hydroco -- hydrocodone is the issue, that would	
	121:24 have a specific -- if it's 30 milligrams or	
	122:1 whatever --	
	122:2 A. Every bottle size, milligram	
	122:3 count, would have a CIN.	
122:14 - 122:22	<b>Lawrence, Stephen 01-04-2019 (00:00:22)</b>	SL02.38
	122:14 Okay. "We could build	
	122:15 a table to the CINs for all these products and	
	122:16 monitor the items sales against your defined	
	122:17 triggers. I'd be more than glad to sit down	
	122:18 with everyone and see if we can't create	
	122:19 something that is less manual and hopefully more	
	122:20 accurate."	
	122:21 Did anyone ever ask you to do	
	122:22 this?	

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122:24 - 123:2	<b>Lawrence, Stephen 01-04-2019 (00:00:06)</b> 122:24 Q. And by "this," I mean your offer 123:1 to have your marketing analytics group create 123:2 this system?	SL02.39
123:4 - 123:19	<b>Lawrence, Stephen 01-04-2019 (00:00:44)</b> 123:4 A. Not to my knowledge. 123:5 Q. Do you have an independent 123:6 recollection of getting a response to this 123:7 e-mail? 123:8 A. I don't remember getting a 123:9 response, no. I don't know if I did or not, but 123:10 I don't remember. I know we never created a 123:11 report like that, so... 123:12 Q. And prior to this time, do you 123:13 have an independent recollection of anyone ever 123:14 asking you to do this type of analysis, the 123:15 analysis that you describe in this e-mail? 123:16 A. No. 123:17 Q. Okay. 123:18 MS. QUEZON: I need 4230, do you 123:19 have that? It's the -- okay.	SL02.40
123:20 - 124:19	<b>Lawrence, Stephen 01-04-2019 (00:00:54)</b> 123:20 I actually have three of these if 123:21 y'all want them. 123:22 And what exhibit is that, Mark? 123:23 MR. GRAY: 9. 123:24 MS. QUEZON: 9. 124:1 - - - 124:2 (Cardinal-Lawrence Exhibit 9 marked.) 124:3 - - - 124:4 BY MS. QUEZON: 124:5 Q. And I'm not going to take you 124:6 through this whole document, Mr. Lawrence. Let 124:7 me first just ask you -- well, take a look at 124:8 it, and my first question is going to be, have 124:9 you ever seen this document before? 124:10 A. No. 124:11 Q. Okay. I'm not going to take you 124:12 through the whole thing. The only two things I 124:13 want to point out, obviously by it's very title,	SL02.106

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	124:14 this is the "Settlement and Release Agreement 124:15 and Administrative Memorandum of Agreement." 124:16 And as you can tell from the first paragraph, it 124:17 is between the DEA and Cardinal. 124:18 Do you see that? 124:19 A. Yes.	
124:22 - 125:3	<b>Lawrence, Stephen 01-04-2019 (00:00:20)</b> 124:22 Q. Are you aware that at some point 124:23 in 2007, in the beginning -- the end of 2007 and 124:24 beginning of 2008, that the DEA issued 125:1 suspensions of licenses for certain distribution 125:2 centers that were owned and operated by Cardinal 125:3 Health?	SL02.41
125:5 - 125:15	<b>Lawrence, Stephen 01-04-2019 (00:00:27)</b> 125:5 A. Yeah, I don't remember the exact 125:6 dates, but, yes, in that time frame, I do 125:7 remember, yes. 125:8 Q. Okay. And as you can see, the -- 125:9 the first two, it looks like these are in 125:10 chronological -- let me try that one more 125:11 time -- these are in chronological order under 125:12 the -- under the section "Background." It 125:13 basically lists the order of -- immediate 125:14 suspension orders that were issued by the DEA. 125:15 Do you see that?	SL02.42
125:18 - 126:1	<b>Lawrence, Stephen 01-04-2019 (00:00:23)</b> 125:18 A. Yes. 125:19 Q. All right. And if we can, we'll 125:20 just look at the first two. So we've got one on 125:21 November 28th, 2007. And that's at the Auburn, 125:22 Washington distribution center. And then on 125:23 December 5th, 2007, it looks like that's for the 125:24 Lakeland facility. 126:1 Do you see that?	SL02.43
126:3 - 126:12	<b>Lawrence, Stephen 01-04-2019 (00:00:36)</b> 126:3 A. Yes. 126:4 Q. Okay. Do you recall how you were 126:5 made aware of the -- the immediate suspension 126:6 orders for the distribution centers during this 126:7 time frame?	SL02.44



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126:8 A. I don't recall specifically, like,  
 126:9 the date, time, exactly whether it was an e-mail  
 126:10 or phone call. I don't recall exactly.

126:11 Q. Okay.

126:12 MS. QUEZON: Let's go to 3707.

126:20 - 127:7 **Lawrence, Stephen 01-04-2019 (00:00:25)**

SL02.45

126:20 - - -

126:21 (Cardinal-Lawrence Exhibit 10 marked.)

126:22 - - -

126:23 BY MS. QUEZON:

126:24 Q. All right. So this would be a day  
 127:1 after the Lakeland facility received its  
 127:2 immediate suspension order and, it looks like,  
 127:3 about nine days after the Auburn, Washington  
 127:4 facility had received its immediate suspension  
 127:5 order.

127:6 And is this an e-mail that you

127:7 authored?

127:9 - 128:7 **Lawrence, Stephen 01-04-2019 (00:00:46)**

SL02.46

127:9 A. It looks that way.

127:10 Q. Okay. And the date of it is

127:11 December 6th, 2007. And who is Scott Storrer?

127:12 A. Scott would have been my boss at

127:13 the time, I believe. He -- I believe he

127:14 replaced Michael Bender. I'm not sure, but I

127:15 think so.

127:16 Q. And do you recall what his title

127:17 was?

127:18 A. I don't. It would have been

127:19 similar to Michael Bender's, I imagine.

127:20 Q. Yes, sir.

127:21 And how about -- is it Tom

127:22 DeGemmis? Am I pronouncing that properly?

127:23 A. Yes. Tom DeGemmis headed up the

127:24 sales team -- the retail independent sales team.

128:1 Q. All right. And so this -- and I

128:2 think you talked about earlier with Mr. Gray

128:3 that the marketing team and the sales team would

128:4 work closely together.

128:5 Is this someone that you would

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128:6	work with on a regular basis?	
128:7	A. Tom DeGemmis?	
128:9 - 129:1	<b>Lawrence, Stephen 01-04-2019 (00:00:31)</b>	SL02.47
128:9	Q. Yes, sir.	
128:10	A. I would work with Tom DeGemmis. I	
128:11	mean, a head of sales operations team and	
128:12	marketing, obviously, work closely with the	
128:13	team.	
128:14	Q. All right. And it basically says,	
128:15	"Scott, Am I hearing it right that ABC and	
128:16	McKesson have systems in place that keep this	
128:17	from happening to them?"	
128:18	Well, first of all, the subject is	
128:19	"DEA issues," right?	
128:20	A. Correct.	
128:21	Q. So to the best of your knowledge	
128:22	and recollection, would this have been in	
128:23	regards to those two ISOs that were issued to	
128:24	the Auburn, Washington facility and the Lakeland	
129:1	facility?	
129:3 - 129:13	<b>Lawrence, Stephen 01-04-2019 (00:00:26)</b>	SL02.48
129:3	A. I would -- I would think so.	
129:4	Q. Okay. "Scott, Am I hearing it	
129:5	right that ABC and McKesson have systems in	
129:6	place that keep this from happening to them? If	
129:7	that is the case, who here at Cardinal allowed	
129:8	our systems to get so far behind and out of	
129:9	compliance that we are getting DEA licenses	
129:10	pulled? This kind of nonaccountability needs to	
129:11	stop. Steve."	
129:12	Do you recall ever receiving a	
129:13	response to this e-mail, Mr. Lawrence?	
129:15 - 129:15	<b>Lawrence, Stephen 01-04-2019 (00:00:01)</b>	SL02.49
129:15	A. I don't.	
129:16 - 129:18	<b>Lawrence, Stephen 01-04-2019 (00:00:13)</b>	SL02.50
129:16	Q. Okay. Now, let's go back, if we	
129:17	can, to the Memorandum of Agreement, which I	
129:18	think is -- was that 9 or -- 9, Exhibit 9.	
129:19 - 129:23	<b>Lawrence, Stephen 01-04-2019 (00:00:22)</b>	SL02.51
129:19	So we've gone through on	

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129:20	November 28th, 2007, the Auburn, Washington.	
129:21	December 5th, 2007, the Lakeland, Florida. So	
129:22	two days later, it looks like an ISO was issued	
129:23	to Swedesboro, New Jersey. And then on	
129:24 - 130:2	<b>Lawrence, Stephen 01-04-2019 (00:00:06)</b>	SL02.52
129:24	January 30th, 2008, the Stafford, Texas	
130:1	facility.	
130:2	Do you know where Stafford is --	
130:4 - 130:4	<b>Lawrence, Stephen 01-04-2019 (00:00:00)</b>	SL02.53
130:4	Q. -- geographically?	
130:8 - 131:13	<b>Lawrence, Stephen 01-04-2019 (00:00:51)</b>	SL02.54
130:8	A. Do I know where it is	
130:9	geographically?	
130:10	Q. Yes, sir.	
130:11	A. I believe it's in Houston --	
130:12	Q. Okay.	
130:13	A. -- in that area.	
130:14	Q. Okay.	
130:15	A. I think it's actually in the town	
130:16	of Stafford, but...	
130:17	Q. All right. So -- and that kind of	
130:18	makes sense. If we go back to that e-mail where	
130:19	the DEA had identified some -- the top 25, I	
130:20	think, or -- pharmacies --	
130:21	A. Correct.	
130:22	Q. -- in the Sta- -- in that Houston	
130:23	area.	
130:24	Do you remem- -- recall that?	
131:1	A. The -- yes.	
131:2	Q. All right.	
131:3	A. The one with Michael Ambrose	
131:4	and --	
131:5	Q. Yes, sir.	
131:6	Okay. And so that's -- that -- in	
131:7	that e-mail -- and this -- that would have	
131:8	been -- go back here. Oh, I've got it right	
131:9	here. Let's see -- October 19th of 2007.	
131:10	So on October 19th, 2007, that's	
131:11	the e-mail where you offered help with your	
131:12	analytics group.	

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131:15 - 131:21	<p>131:13 Do you recall that?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:10)</b></p> <p>131:15 A. That's this -- this e-mail,</p> <p>131:16 Exhibit 8?</p> <p>131:17 Q. Yes, sir.</p> <p>131:18 A. Yes.</p> <p>131:19 Q. All right. So then -- and -- and,</p> <p>131:20 again, to the best of your recollection, no one</p> <p>131:21 took you up on that offer?</p>	SL02.55
131:23 - 132:4	<p><b>Lawrence, Stephen 01-04-2019 (00:00:21)</b></p> <p>131:23 A. That's correct.</p> <p>131:24 Q. All right. And then throughout</p> <p>132:1 November and December and January, as these ISOs</p> <p>132:2 are being issued, did anyone ever take you up on</p> <p>132:3 your offer to help them create a system to</p> <p>132:4 identify suspicious orders?</p>	SL02.56
132:7 - 132:18	<p><b>Lawrence, Stephen 01-04-2019 (00:00:18)</b></p> <p>132:7 A. What was the question again?</p> <p>132:8 Q. During this time period -- so you</p> <p>132:9 make your offer in October.</p> <p>132:10 A. Oh.</p> <p>132:11 Q. And now we're getting all of these</p> <p>132:12 suspensions.</p> <p>132:13 During the time period when all of</p> <p>132:14 these suspensions are being handed out by the</p> <p>132:15 DEA, did anyone from Cardinal ever come to you</p> <p>132:16 and say, "You know what, Mr. Lawrence? We do</p> <p>132:17 want you to help us create a system to -- to</p> <p>132:18 identify triggers"?</p>	SL02.57
132:21 - 133:4	<p><b>Lawrence, Stephen 01-04-2019 (00:00:14)</b></p> <p>132:21 A. So you're talking about from</p> <p>132:22 October through, like, December?</p> <p>132:23 Q. Yes.</p> <p>132:24 A. I mean, not to my recollection.</p> <p>133:1 And I -- I don't know if I ever could have</p> <p>133:2 helped them, but it's -- it's a concerned</p> <p>133:3 employee reaching out trying to say, I'll help</p> <p>133:4 if I can.</p>	SL02.58
138:18 - 138:24	<p><b>Lawrence, Stephen 01-04-2019 (00:00:27)</b></p> <p>138:18 Q. So maybe the question is better.</p>	SL02.59

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138:19 Since 2005, March of 2005, when you -- as we  
 138:20 looked earlier at the offer of employment letter  
 138:21 when you actually started working in the  
 138:22 marketing side, was there -- the sales data  
 138:23 warehouse, was that in place at the time that  
 138:24 you began in 2005?

139:2 - 140:3

**Lawrence, Stephen 01-04-2019 (00:00:53)**

SL02.60

139:2 A. I don't know. I couldn't answer  
 139:3 that. I mean, I -- I don't know exactly when  
 139:4 the sales data warehouse was created. So I  
 139:5 don't know.  
 139:6 Q. Do you remember a time that it was  
 139:7 created, or do you just recall that it existed?  
 139:8 A. I recall there was always a way to  
 139:9 get sales data.  
 139:10 Q. Okay.  
 139:11 A. So I don't know when we formally  
 139:12 called it a sales data warehouse, but I think we  
 139:13 always had a way to get sales data. I mean, any  
 139:14 business, you would have a reporting tool.  
 139:15 Q. Sure.  
 139:16 And then the -- I believe it's the  
 139:17 CIN number, is that -- did I get the  
 139:18 abbreviation correct?  
 139:19 A. The Cardinal item number, yeah.  
 139:20 Q. All right. And has that been in  
 139:21 place the entire time that you have been  
 139:22 employed with Cardinal since March of 2005?  
 139:23 A. Yes. Now, those numbers change,  
 139:24 obviously, but it's a numbering system for a  
 140:1 product.  
 140:2 Q. Got it.  
 140:3 A. It's Cardinal-specific.

140:4 - 140:11

**Lawrence, Stephen 01-04-2019 (00:00:20)**

SL02.79

140:4 Q. Okay. Now, I think that the last  
 140:5 exhibit we looked at was Exhibit Number 10,  
 140:6 which was the e-mail that, I believe, you sent  
 140:7 in -- on December 6th of 2007; is that correct?  
 140:8 A. Correct.  
 140:9 Q. All right. And to the best of

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140:14 - 140:19	<p>140:10 your recollection, you did not receive a 140:11 response to this e-mail?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:12)</b></p> <p>140:14 A. Not that I remember. I mean, this 140:15 was, like I said in closing, last time, this was 140:16 a -- kind of a concerned employee just trying to 140:17 offer help if -- if I could, and I don't even 140:18 know if I could have helped because I didn't 140:19 know what all of the issues were, but...</p>	SL02.86
144:16 - 144:24	<p><b>Lawrence, Stephen 01-04-2019 (00:00:31)</b></p> <p>144:16 Q. And I know we had talked about 144:17 that e-mail earlier where you had talk -- that 144:18 you had suggested that perhaps using the sales 144:19 data warehouse and -- and -- to -- to look back 144:20 33 months to get, you know, some sales 144:21 information, did anyone during this period of 144:22 time, meaning December of 2007, when the 144:23 limiters are being set, did anyone ask you or 144:24 your marketing analytics team to do that?</p>	SL02.77
145:3 - 145:10	<p><b>Lawrence, Stephen 01-04-2019 (00:00:18)</b></p> <p>145:3 A. They didn't ask me specifically to 145:4 do that. There was a -- you know, there was a 145:5 robust system run by QRA that was already in 145:6 place and had been in place for a long, long 145:7 time that they managed. So I assume they didn't 145:8 need our help with doing things because they -- 145:9 they had more data and more intel by the time we 145:10 would have anyways.</p>	SL02.87
145:11 - 145:14	<p><b>Lawrence, Stephen 01-04-2019 (00:00:09)</b></p> <p>145:11 Q. Okay. And you say that it was a 145:12 robust system, I believe was your statement. 145:13 Do you actually know what system 145:14 was in place prior to 2007?</p>	SL02.82
145:16 - 146:3	<p><b>Lawrence, Stephen 01-04-2019 (00:00:34)</b></p> <p>145:16 A. Well, we talked about it before. 145:17 There was a system that -- we have a -- and 145:18 we've had a system for as long as I can remember 145:19 that has thresholds on every product you -- you 145:20 buy. I mean, we -- on any product, whether it's 145:21 controlled or not, you can't let one customer</p>	SL02.88

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146:4 - 146:11	<p>145:22 accidentally order everything you have in a  145:23 distribution center by mistyping a thousand into  145:24 10,000 or something. And so those -- every  146:1 product has limits on it. It's been in place  146:2 since I know, and they continued to enhance it  146:3 and use modern technology and all of that.</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:13)</b></p> <p>146:4 Q. Prior to 2007, do you know who was  146:5 in charge of determining whether a limit for  146:6 a -- particularly for an opioid had been hit?  146:7 A. Who would determine whether it had  146:8 been hit?  146:9 Q. Yes.  146:10 A. It would be in QRA. The QRA group  146:11 would do that.</p>	SL02.78
146:12 - 146:21	<p><b>Lawrence, Stephen 01-04-2019 (00:00:19)</b></p> <p>146:12 Q. Do you know how many people were  146:13 in QRA prior to 2007?  146:14 A. I don't. I don't know.  146:15 Q. Do you know what their budget was  146:16 prior to 2007?  146:17 A. No.  146:18 Q. Do you know whether the robust  146:19 system that you referred to re -- relied on  146:20 pickers and checkers to ensure that excessive  146:21 orders were not distributed?</p>	SL02.83
146:23 - 147:10	<p><b>Lawrence, Stephen 01-04-2019 (00:00:15)</b></p> <p>146:23 A. I don't know.  146:24 Q. Do you know what pickers and  147:1 checkers are?  147:2 A. I was going to ask you what --  147:3 you're talking about pickers and checkers, like  147:4 in a distribution center?  147:5 Q. Yes, sir.  147:6 A. I don't know what the operations  147:7 group's role were.  147:8 Q. Okay.  147:9 A. But I really focused on the sales  147:10 team, so I don't know.</p>	SL02.89
189:23 - 189:24	<p><b>Lawrence, Stephen 01-04-2019 (00:00:01)</b></p>	SL02.61

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189:23 (Cardinal-Lawrence Exhibit 18 marked.) 189:24 - - -		
190:14 - 190:20	<b>Lawrence, Stephen 01-04-2019 (00:00:18)</b> 190:14 BY MS. QUEZON: 190:15 Q. So, Mr. Lawrence, I think when we 190:16 took a break, we were getting ready to look at 190:17 Exhibit -- what is that -- 18. Here you go. 190:18 Same drill. Just when you've had 190:19 an opportunity to familiarize yourself, just let 190:20 me know.	SL02.62
190:22 - 192:4	<b>Lawrence, Stephen 01-04-2019 (00:01:17)</b> 190:22 A. Okay. 190:23 Q. All right. So starting from the 190:24 bottom, obviously, Mr. Jeff Henderson, who is 191:1 that? 191:2 A. Jeff Henderson, I believe, was the 191:3 CFO of Cardinal -- 191:4 Q. Okay. And -- 191:5 A. -- at that time. 191:6 Q. -- the e-mail from Mr. Henderson 191:7 is directed to Mr. Storrer with a CC to Mark 191:8 Hartman. I'm familiar with Mr. Hartman. 191:9 Mr. Storrer, was that your -- 191:10 A. That was my boss. 191:11 Q. Your supervisor at this time? 191:12 A. Yeah. He -- right. He took 191:13 Mark -- Michael Bender's place. 191:14 Q. Okay. And the subject matter is 191:15 "Diversion Steering Committee Follow-Ups." 191:16 Were you ever a member of the 191:17 diversion steering committee? 191:18 A. No. 191:19 Q. All right. So there's just a -- a 191:20 few issues here that are brought up by 191:21 Mr. Henderson to Mr. Storrer and perhaps 191:22 Mr. Hartman. And the one I want to talk to you 191:23 about, first of all, is the -- I guess it's like 191:24 the third asterisk, it's the very last sentence. 192:1 It says, "Reporting of suspicious customers (for 192:2 example, an amnesty program)."	SL02.63



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192:6 - 193:7	<p>192:3 Are you familiar with what</p> <p>192:4 Mr. Henderson is referring to here?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:58)</b></p> <p>192:6 A. Yes.</p> <p>192:7 Q. What is your understanding?</p> <p>192:8 A. So at this time, there were some</p> <p>192:9 executives that didn't know the retail</p> <p>192:10 independent compensation plan and they were</p> <p>192:11 asking if it would help that we would allow</p> <p>192:12 people to report suspicious orders and give them</p> <p>192:13 amnesty to -- so it wouldn't hurt their</p> <p>192:14 compensation.</p> <p>192:15 What they didn't realize is we had</p> <p>192:16 always taken any of these -- customers cut off</p> <p>192:17 for a variety of reasons, we would take out of</p> <p>192:18 the compensation plan anyways. It would never</p> <p>192:19 hurt the sales rep. So he was asking for</p> <p>192:20 something that he just didn't understand the</p> <p>192:21 comp plan already had in place.</p> <p>192:22 Q. Okay. And then the second</p> <p>192:23 question is, "How do we remove incentives to</p> <p>192:24 reporting suspicious customers?"</p> <p>193:1 A. Same answer as -- it was already</p> <p>193:2 in the compensation plan. If you report a</p> <p>193:3 suspicious customer and ultimately they end up</p> <p>193:4 getting cut off, it would not hurt your</p> <p>193:5 compensation plan.</p> <p>193:6 Q. Who are suspicious customers</p> <p>193:7 reported to?</p>	SL02.64
193:9 - 194:5	<p><b>Lawrence, Stephen 01-04-2019 (00:00:44)</b></p> <p>193:9 A. That, I don't know. He was asking</p> <p>193:10 a question, and I don't know who they reported</p> <p>193:11 to or what the question was pertaining to.</p> <p>193:12 Q. Did you know the answer to that</p> <p>193:13 question when you -- when you were eventually</p> <p>193:14 sent this e-mail?</p> <p>193:15 A. Well, I know how I would answer</p> <p>193:16 it. I mean, I would report a suspicious</p> <p>193:17 customer to QRA. I don't know of anybody else I</p> <p>193:18 would report them to. But other people could</p>	SL02.65

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193:19 report it to me, maybe. You know, there's  
 193:20 different -- I would report it to QRA.  
 193:21 Q. And then finally, again he says --  
 193:22 and this is the CFO -- "How do we ensure sales  
 193:23 rep incentives aren't harmed by reporting  
 193:24 customers?"

194:1 A. Correct.

194:2 Q. Okay. And -- and it's your  
 194:3 understanding that that was always part of the  
 194:4 incentive program, it's just that the chief  
 194:5 financial officer wasn't aware of that?

194:7 - 195:7

**Lawrence, Stephen 01-04-2019 (00:01:05)**

SL02.66

194:7 A. That is absolutely correct. Yeah.  
 194:8 And my team ran the compensation plan so that's  
 194:9 why I knew it so well.  
 194:10 Q. For both marketing and sales?  
 194:11 A. Well, when I had marketing, those  
 194:12 people reported to me, so they weren't on a  
 194:13 sales compensation plan, they had basically the  
 194:14 MBO plan, like we talked about. In our sales  
 194:15 operations group, we created a sales  
 194:16 compensation plan team that ran the sales  
 194:17 compensation plan, yes.  
 194:18 Q. And did you do that from the time  
 194:19 that you were in the marketing department from  
 194:20 March of 2005 forward?

194:21 A. No. It -- I don't know exactly  
 194:22 when. We created a sales operations team and  
 194:23 started doing the compensation plan. Probably  
 194:24 would have been around '07 or so because, as I  
 195:1 said before, before that the sales reps reported  
 195:2 out into the distribution centers, so they were  
 195:3 all compensated by whatever the distribution  
 195:4 center vice president decided. Once we had a  
 195:5 national team, then we did have to do a  
 195:6 compensation plan. I believe that was somewhere  
 195:7 in the '07 time frame.

195:8 - 195:13

**Lawrence, Stephen 01-04-2019 (00:00:19)**

SL02.107

195:8 Q. Okay. So prior to your creation  
 195:9 of the -- of the sales compensation package, if

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195:10 - 195:23	<p>195:10 you will, do you know whether the reporting of</p> <p>195:11 suspicious customers was taken into</p> <p>195:12 consideration by the distribution center</p> <p>195:13 managers?</p> <p><b>Lawrence, Stephen 01-04-2019 (00:00:23)</b></p> <p>195:15 A. I don't -- I don't honestly know</p> <p>195:16 how the sales team was compensated when they</p> <p>195:17 reported the distribution center, so I couldn't</p> <p>195:18 answer that.</p> <p>195:19 Q. Okay. What you know is that when</p> <p>195:20 you were -- when you were a part of the creation</p> <p>195:21 of sort of the centralized sales incentive</p> <p>195:22 program, the reporting of suspicious customers</p> <p>195:23 was taken into account?</p>	SL02.67
196:1 - 197:16	<p><b>Lawrence, Stephen 01-04-2019 (00:01:43)</b></p> <p>196:1 A. Yes. So we -- when we had the --</p> <p>196:2 when we ran the sales compensation plan, we --</p> <p>196:3 the sales team could always come to us and say,</p> <p>196:4 I think this customer should be taken out of the</p> <p>196:5 plan, for a variety of reasons. Could be</p> <p>196:6 credit, could be some other reasons. And then</p> <p>196:7 we would decide yes or no. Sometimes they would</p> <p>196:8 come up with a not so good reason, like --</p> <p>196:9 whatever. But anything with QRA was just taken</p> <p>196:10 out automatically.</p> <p>196:11 Q. Okay. And -- and I guess my</p> <p>196:12 question is, prior to that centralization of the</p> <p>196:13 plan, do you have personal knowledge as to how</p> <p>196:14 the sales teams were incentivized?</p> <p>196:15 A. I do not.</p> <p>196:16 Q. Okay. All right. So then the</p> <p>196:17 e-mail from Mr. Henderson, it looks like, is</p> <p>196:18 forwarded from Mr. Storrer to you and a few</p> <p>196:19 other people, and you respond back to</p> <p>196:20 Mr. Storrer. And let's look at that --</p> <p>196:21 A. Uh-huh.</p> <p>196:22 Q. -- top section first. You mention</p> <p>196:23 that "Tom," meaning Mr. DeGemmis, "and I have</p> <p>196:24 been living with this for quite a while. We</p> <p>197:1 have communicated with the field on the</p>	SL02.68

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197:2 communication of any order being blocked."

197:3 Regulatory faxes the store questionnaire -- a

197:4 lot of this we've already covered in your

197:5 testimony --

197:6 A. Uh-huh.

197:7 Q. -- which you get copied on. And

197:8 then you forward to the sales team.

197:9 The customer has five business

197:10 days to return it and then regulatory makes a

197:11 decision, correct?

197:12 Well, it says, "Regulatory will

197:13 make a decision" --

197:14 A. Yeah.

197:15 Q. -- "on upping the customer

197:16 threshold and doing a site visit," right?

197:18 - 199:5 **Lawrence, Stephen 01-04-2019 (00:01:21)**

**SL02.69**

197:18 A. Correct. To be more precise,

197:19 because it ties back to my other e-mail, is they

197:20 may not make their decision the moment they get

197:21 it, but they wouldn't cut the customer off after

197:22 five days if they had the questionnaire. They

197:23 would wait until they saw the questionnaire and

197:24 then analyze it.

198:1 If they got no questionnaire, they

198:2 were cutting them off in five days. And that's

198:3 part of the bottom of the e-mail, is we had a

198:4 backlog and that's why I urged them to give us

198:5 more time before they actually cut a customer

198:6 off. You still would not release the order that

198:7 hit the threshold or any subsequent orders for

198:8 that product, but we needed more time because of

198:9 the backlog.

198:10 Q. So then you go on, "I have not

198:11 been involved in the reporting of suspicious

198:12 customers so, Tom," meaning Mr. DeGemmis, "maybe

198:13 you can fill in the blanks on this one."

198:14 Right?

198:15 A. Correct. Because that --

198:16 Q. Then --

198:17 A. Again, I was in marketing. That

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198:18 would go straight from the sales to QRA. So I  
 198:19 didn't -- wasn't involved in those.  
 198:20 Q. Okay. Then you go on to talk  
 198:21 about, "The main problem is that 90 stores have  
 198:22 been shut off from ordering controlled  
 198:23 substances. 60 of those, or two-thirds, are not  
 198:24 currently scheduled to have a site visit and  
 199:1 have not been told what the status is on these.  
 199:2 Many of these were cut off on December 10th.  
 199:3 It's now close to a month. This is what I've  
 199:4 been telling everyone for quite some time now."  
 199:5 Who is "everyone"?

199:7 - 200:9

**Lawrence, Stephen 01-04-2019 (00:00:51)**

SL02.70

199:7 A. This goes right back to what I  
 199:8 said before. The -- I was working with  
 199:9 quality -- the QRA group to give us more time  
 199:10 and not cut a customer off after the five days.  
 199:11 If it took -- the store got a questionnaire back  
 199:12 in six days, you know, did it matter? And we  
 199:13 were -- we just had a hard five day, we're just  
 199:14 going to cut them off. And that didn't make a  
 199:15 lot of sense to me.  
 199:16 And ultimately fairly -- I think,  
 199:17 I don't know what the dates are, but they agreed  
 199:18 and they gave a little bit more time.  
 199:19 Q. And that's the --  
 199:20 A. Which helped a bunch.  
 199:21 Q. I'm sorry. That's the e-mail that  
 199:22 we saw earlier?  
 199:23 A. That's the previous e-mail we just  
 199:24 talked about.  
 200:1 Q. Okay. And then you go on to say,  
 200:2 "I spent three hours with Hartman and the  
 200:3 regulatory group on Friday and they are trying.  
 200:4 They just don't have the resources, and they are  
 200:5 trying to keep too much information from others.  
 200:6 I hope this will open up some soon. Steve."  
 200:7 The comment on resources, was that  
 200:8 your observation, or was that something that the  
 200:9 regulatory group told you?

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200:11 - 201:6	<b>Lawrence, Stephen 01-04-2019 (00:00:52)</b> 200:11 A. You know, I don't remember 200:12 exactly. I think the challenge was getting -- 200:13 we were getting a backlog so we couldn't get 200:14 through the Know Your Customer forms quick 200:15 enough. So by just pure definition, you've got 200:16 a resource issue there or something clogging it 200:17 up. I don't specifically remember having that 200:18 conversation with them. 200:19 But at the end of the day, what 200:20 came out of it was that other e-mail where we 200:21 got some extra time so that we just didn't cut 200:22 them off on five days, which was just a hard 200:23 five-day -- there was no -- there wasn't, you 200:24 know, meaning behind it, just five days. 201:1 Q. At this point in time, 201:2 Mr. Lawrence -- so this is December -- I'm 201:3 sorry, January of 2008 -- in comparison to the 201:4 300-or-so employees in sales and the 50-or-so 201:5 employees in marketing, do you know how many 201:6 employees actually worked within QRA?	SL02.71
201:8 - 201:12	<b>Lawrence, Stephen 01-04-2019 (00:00:10)</b> 201:8 A. I do not. 201:9 Q. In comparison to your budget in 201:10 marketing or the budget that eventually you were 201:11 over in sales, do you know what their budget was 201:12 for QRA?	SL02.72
201:14 - 201:14	<b>Lawrence, Stephen 01-04-2019 (00:00:00)</b> 201:14 A. No.	SL02.73

Plaintiffs Affirmative Designations = 00:47:30

Defense Counter Designations = 00:04:09

Plaintiff Counter Counters = 00:01:19

Defense Completeness Counters = 00:03:37

**Total Time = 00:56:35**